

Before the  
**TENNESSEE REGULATORY AUTHORITY**

In the Matter of

UNIVERSAL TELECOM, INC.  
Complainant

v.

CITIZENS COMMUNICATIONS  
COMPANY OF THE VOLUNTEER  
STATE, LLC  
Defendant

REC'D TN  
REGULATORY AUTH.  
\*02 JAN 9 PM 12 45

OFFICE OF THE  
EXECUTIVE SECRETARY

Docket No. 01-00854

**DISCOVERY REQUESTS OF UNIVERSAL TELECOM, INC.**

Universal Telecom, Inc. ("Universal Telecom"), by counsel, submits the following discovery requests to Citizens Communications Company of the Volunteer State, LLC ("Citizens").

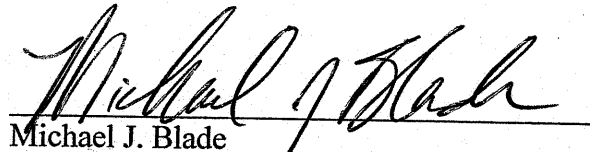
1. Please state whether Citizens possesses the technical capability to block operator services, directory assistance, or discrete portions of either (for example, directory assistance call completion). If Citizens does not have the technical capability to block such services, please provide a detailed explanation of why Citizens is not technically capable of doing so.
2. Please provide a list of all interconnection or resale agreements between Citizens and another competitive or incumbent local exchange carrier in the state of Tennessee under which Citizens provides the other local exchange carrier with a discount on resold telecommunications services. Please state the discount applicable to and the expiration date of each such agreement.
3. Please state whether, under each of the agreements listed in response to discovery request number 2, Citizens has the authority to refuse to provide telecommunications services for resale by the local exchange carrier if the end user of the resold services has a delinquent or outstanding account with Citizens.

4. Please state whether Citizens currently blocks access to operator services, directory assistance, or discrete portions of either for any local exchange carrier in the state of Tennessee. Please identify any local exchange carrier for whom Citizens provides this service.

5. Please state whether Citizens will allow Universal Telecom to receive the discount being provided to other local exchange carriers (including Citizens' affiliates). If Citizens will not allow Universal Telecom to receive the discount being provided to other local exchange carriers (including Citizens' affiliates), please explain why Citizens will not do so, including any legal authority relied upon to in support of such refusal.

6. Please state the earliest date that Universal Telecom could receive the discount rate being provided to other local exchange carriers.

Respectfully submitted,



Michael J. Blade  
**DINSMORE & SHOHL LLP**  
Suite 1100, NationsBank Plaza  
414 Union Street  
Nashville, TN 37219  
(615) 313-3300

and

John E. Selent  
Edward T. Depp  
**DINSMORE & SHOHL LLP**  
2000 Meidinger Tower  
462 South Fourth Avenue  
Louisville, Kentucky 40202  
(502) 540-2300 (tel.)  
(502) 585-2207 (fax)

**COUNSEL TO UNIVERSAL  
TELECOM, INC.**

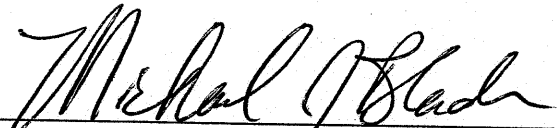
**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing was served via facsimile and first class United States mail, this 7th day of January, 2002, on the following individuals.

J. Michael Swatts  
Director, State Government Affairs  
300 Bland Street  
P.O. Box 770  
Bluefield, WV 24701

Gregg C. Sayre  
Associate General Counsel  
180 South Clinton Avenue  
Rochester, New York 14646-0700

Hon. David K. Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

  
COUNSEL TO UNIVERSAL TELECOM,  
INC.